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8
9

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **SANTA ANA DIVISION**

13 In re:
14 THE LITIGATION PRACTICE GROUP, PC,
15 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

**SUPPLEMENTAL DECLARATION OF
CHRISTOPHER CELENTINO
REGARDING LODGMENT OF ORDER (A)
APPROVING SALE OF ASSETS FREE
AND CLEAR OF ALL LIENS, CLAIMS,
ENCUMBRANCES AND INTERESTS
PURSUANT TO 11 U.S.C. § 363(b), (B)
APPROVING ASSUMPTION AND
ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND
UNEXPIRED LEASES AND OTHER
AGREEMENTS, AND (C) GRANTING
RELATED RELIEF**

Date: July 21, 2023

Time: 10:00 a.m.

Ctrm: 5C

Judge: Hon. Scott C. Clarkson

1 I, Christopher Celentino, declare that the following is true and correct, under penalty of
2 perjury:

3 1. I am an attorney duly licensed to practice before this Court. I am of counsel at the
4 law firm Dinsmore & Shohl LLP, and Special Counsel to Richard A. Marshack, Chapter 11 Trustee
5 (the "Trustee"). I make this Declaration based on personal knowledge and if called to testify to the
6 truthfulness of its contents, could and do so competently.

7 2. Since the sale hearing conducted by the Court on July 21, 2023, we have engaged
8 both the Office of the United States Trustee (the "OUST") and the Official Committee of Unsecured
9 Creditors ("OCC") by and through their counsel, Fox Rothschild and attorneys Keith Owens and
10 Nicolas Kofforth, concerning the proposed ORDER (A) APPROVING SALE OF ASSETS FREE
11 AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS PURSUANT
12 TO 11 U.S.C. § 363(b), (B) APPROVING ASSUMPTION AND ASSIGNMENT OF CERTAIN
13 EXECUTORY CONTRACTS AND UNEXPIRED LEASES AND OTHER AGREEMENTS,
14 AND (C) GRANTING RELATED RELIEF (the "Proposed Sale Order").

15 3. On August 2, 2023, I engaged with the OUST regarding the Proposed Sale Order
16 attached to the Notice of Lodgment of Order filed by our office on August 1, 2023. Ms. Ng, of the
17 OUST, indicated:

18 As long as the Sale Order and the APA (attached to the Sale Order) are consistent
19 with the Court's previous order entered on 7/22/23 and the additional
20 terms/conditions recited on the record at the Sale Hearing, the UST has no further
issues with them.

21 4. It is my belief that the Proposed Sale Order lodged on August 1, 2023 is consistent
22 with the Court's previous order entered on 7/22/23 and the additional terms/conditions recited on
23 the record at the Sale Hearing, as the pre-condition to Ms. Ng's and the UST's non-opposition to
24 entry of the Sale Order.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing
26 is true and correct and that this declaration was executed on August 2, 2023 at San Diego, California.

27
28 /s/ Christopher Celentino
Christopher Celentino

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document entitled: **SUPPLEMENTAL DECLARATION OF CHRISTOPHER CELENTINO REGARDING LODGMENT OF ORDER (A) APPROVING SALE OF ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES AND INTERESTS PURSUANT TO 11 U.S.C. § 363(b), (B) APPROVING ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES AND OTHER AGREEMENTS, AND (C) GRANTING RELATED RELIEF**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On August 2, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On August 2, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on August 2, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 2, 2023
Date

Caron Burke
Printed Name

/s/ Caron Burke
Signature

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